

Public Comment for the Olympia Planning Commission
 February 22, 2021
 Helen Wheatley, Olympia Resident

The Planning Commission is being asked to consider language presented by Thomas Architecture Studios, on contract to the Port of Olympia, regarding a proposed RV Park in the Marina District of the Port.

The Port earlier asked for a change to the Shoreline Master Program to include RV Parks as “water-oriented recreation.”

Now it is asking for change to the municipal code to alter permitted uses under the Urban Waterfront Plan.

Why is this necessary? Because up until now, neither the Port of Olympia Strategic Plan, nor the change to the Olympia comprehensive plan in order to implement the Downtown Strategy, have allowed camping on the urban waterfront.

Not in the Plans

The proposed RV campground is located in what the Port’s comprehensive scheme designates as part of its “Marina District.” A commercial RV camping facility introduces a new land use to the Port’s strategic plan for that district. Yet the Port has not formally modified its strategic plan. Nor has it initiated a process to formally do so.

In fact, both comprehensive plans currently exclude camping. For Olympia, modification to the strategic plan based on the Downtown Strategy (Ordinance No. 7032) is extremely specific in its *exclusion* of RV camping:

Suggested permitted and conditions uses for a UW-F2 Commercial District specifically exclude RV Parks under the section on “Services, L:

8. SERVICES, LODGING					Urban Waterfront						
Bed & Breakfast Houses (1 guest room)	P	P	P	P	P	P	P			P	P
		18.06.060(E)	18.06.060(E)	18.06.060(E)							
Bed & Breakfast Houses (2 to 5 guest rooms)	C	P	P	P	P	P	P		C	P	P
		18.06.060(E)	18.06.060(E)	18.06.060(E)							
Hotels/Motels			P	C	P		P		P		
Lodging Houses		P	P	P	P		P		P	P	P
Recreational Vehicle Parks			P								
District-Wide Regulations	18.06.060(R)				18.06.060(F)(2)	18.06.060(HH)	18.06.060(F)(2)				

This chart demonstrates that the Port is asking the Planning Commission to consider a change to the strategic plans of both governments. The Planning Commission should deliberate with a full awareness of what is being requested of it by the Port.

The City should ask the Port when and how it intends to modify its comprehensive plan to permit RV camping in its marina district, because it hasn't happened yet.

The current "Destination Waterfront" process in which the Port is engaged, like its Vision 2050 Plan, is an outreach process only and not a modification to the strategic plan. Before moving forward, the city should demand greater clarity from the Port regarding its plans to update its actual strategic plan.

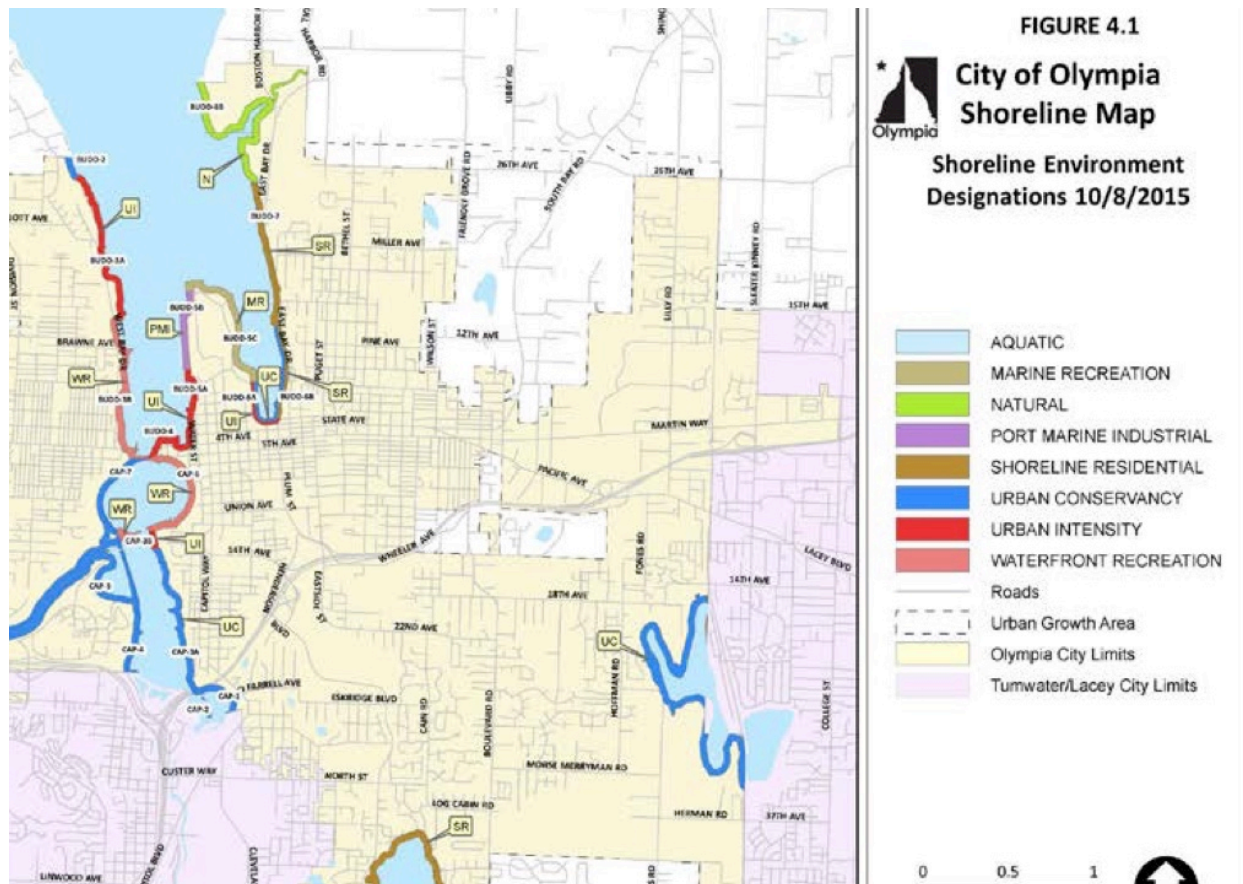
Despite years of strategic planning, the city of Tumwater is currently engaged in a protracted and, so far, failed effort to get the Port of Olympia to engage in completion of a development agreement regarding the New Market Industrial Campus. As a neighbor and partner, Olympia may want to consider more deliberately the extent to which Port plans and promises should be backed by solid policy-making procedures.

Olympia Should Demand Consideration of Other Land Uses

When it worked on its Downtown Strategy, the City of Olympia was quite clear about the fact that there are other land use considerations for the Port Peninsula.

When the city worked on its Downtown Strategy, it did not include the Port's Boatworks and Marina Districts (designated under the Port's comprehensive plan) in its consideration of land use changes. Indeed, the city specifically recognized a need for "Recognition of the importance of lands near water." The City emphasized that the focus of the change to the Comprehensive Plan for the Downtown Strategy and any accompanying code changes were specifically aimed at "'built' land uses such as housing and commercial structures and development patterns." It left "complementary parks, open spaces and natural areas" to be "addressed in the Public Health, Parks, Arts and Recreation and Natural Environment chapters."

The City also states in regard to the Downtown Strategy that "the Future Land Use Map...is *not* a zoning map." (emphasis added). Rather, it is a *guidance* for zoning and other regulations to be consistent with the Comprehensive Plan. The Zoning Map presented with the Packet is consistent the Future Land Use map, but it is crucial to note that it is not consistent with the Shoreline map under the SMP:



At the time the city changed its comprehensive plan for the Downtown Strategy, the City was clearly deferring discussion of shoreline land use, to a significant degree, to revision of the SMP.

Concerning the shoreline of the Port's Urban Waterfront, the SMP specifically calls out the importance of being consistent with the Port's comprehensive scheme in its section on marine recreation, 2.9(F): "The City recognizes the Port's responsibility to operate its marine facilities and plan for this area's future use through the development and implementation of its Comprehensive Scheme of Harbor Improvements."

The SMP language change to include RV camping is therefore somewhat ill-considered and creates some inadvertent internal contradiction, because camping is not yet a strategic plan option for urban shorelines.

In addition, adding the RV language to the SMP sows some confusion because Olympia has created its own term, "water-oriented recreation" which elides confusingly the more conventional policy distinction between water-based recreation and water-enhanced recreation.

What is "orientation?" Other governments, as well as professional literature concerning the recreation and leisure industry, distinguish between water-based recreation, which requires water, and water-enhanced recreation, which benefits from water but does not require it. Water-based recreation is understood to mean such activities as boating and fishing, or even the viewing of landscape and wildlife unique to water and shorelines that cannot be viewed in a strictly land-bound area.

The continued designation of the Port's Marina as Marine Recreation shoreline (Reach 5C) rather than changing the area to Waterfront Recreation or Urban Intensity under the current revision, certainly implies an intention that shoreline recreational use continue to be water-based in Reach 5C. Adding the RV language in one section of the

SMP without changing the zoning or environment designations mapped, creates an unresolved internal contradiction within the SMP. The City should not move forward on the RV Park until it resolves this contradiction.

The Shoreline Management Act is very clear about preserving public access, which raises an interesting policy question about whether it would be appropriate under the SMP to replace a shoreline area that is now fully accessible to the public for recreation (and with significant water-based viewing opportunity), in order to turn it into commercial space not accessible to the general public (for water-enhanced private camping). The SMP includes stated goals and policies to “Increase public access to publicly-owned areas of the shoreline” and “Increase recreational opportunities for the public in the shoreline.” This would seem to imply that public access should be preferred over privatization of recreation.

Setting aside questions about recreational use of the land, and just looking at commercial use, Section B(4) of the SMP discusses the intention for the Urban Waterfront District shoreline (18.06.060 F2 Commercial District) with the following phrases:

“Encourage high-amenity recreation, tourist-oriented, and commercial development which will *enhance public access* and use of the shoreline”; “Encourage development that...*preserves a sense of openness on the waterfront*”; “Encourage water-dependent and water-related development (as defined in the Shoreline Master Program for the Thurston Region) on shoreline properties and permit light manufacturing uses which *support nearby industrial and marine related uses*” (emphasis added)

In regard to optimizing shoreline use, the SMP actually provides a roadmap for the city of Olympia to consider land use changes on the shoreline to achieve preferred use. No net loss is one stated policy, but so is the including of “incentives to restore shoreline ecological functions where such functions have been degraded by past actions.” It lists “restoration and enhancement of shoreline ecological functions” as “high priorities” that are to be “applied to all uses, developments and activities that may occur within the shoreline jurisdiction.”

It also calls for “Provision of direct physical access to the water where appropriate,” and “provision of a shoreline trail where feasible and consistent with applicable laws.” It calls for restoration of native vegetation. It calls for “bulkhead removal and replacement of hardened shoreline with soft structural stabilization measures water-ward of Ordinary High Water Mark where appropriate.” It states that “Space for preferred shoreline uses should be reserved. Such planning should consider upland and in-water uses [and]...public access and views.”

In the Marine Recreation Environment section, the SMP states that preferred uses “Encourage bulkhead removal and replacement of hardened shoreline with soft structural stabilization measures.”

When considering land use within the Marine Recreation Environment, economic development is placed within a matrix that includes “a variety of benefits to the community including boat moorage...public access, water enjoyment, recreation,” and “wildlife habitat.”

And most importantly, the City clearly calls in the SMP for changes in land use to be wrapped into a “jointly developed shoreline restoration and stabilization plan for Reaches 5C and 6A.”

The SMP makes it very clear: after a restoration and stabilization plan is developed, “the City will initiate a limited amendment to the SMP to implement this Plan.” The proper time to consider changes to the code in regard to RV camping, would be *after* a decision is made to allow RV camping on the shoreline. And the proper way to consider such a revision of land use, is to *jointly develop a restoration and stabilization plan* for the shoreline.

The Timing is Wrong

City preferences for restoration and stabilization under the SMP must be duly considered and incorporated. Climate change must be duly considered. Preserving and enhancing public access to the shoreline and preventing net loss of water-based recreational opportunities must be duly considered. Finally, given an increasing emphasis

on environmental justice and the element of recreational access within that policy concern, the benefit of the balance of Port recreational activities to all residents of the Port district should be duly considered.

The Port is jumping the gun in bringing forward changes to the city code. Clearly, it needs to work jointly with the city on developing a strategic plan for the shoreline, instead of simplistically rolling the Port's marine shoreline into a more general suggested planning guideline of "urban waterfront" that covers the whole of the peninsula except for the Marine Terminal. Together, the City and the Port should decide whether an RV constitutes a *preferred* shoreline use. Only then should the City consider changing its code to accommodate this brand new land use.

The City of Olympia, unlike the Port, has another urgent consideration.

The City of Olympia is currently engaged in dialogue with other local governments regarding homeless mitigation. RV camping is a big part of that conversation. It seems tone-deaf, at the very least, to consider RV camping as profit-earning recreation only, when there is an urgent local need for RV camping for housing mitigation.

The City could consider, and decide, that it wants a mitigation site on the Port peninsula. This is absolutely possible under the Port RCWs. Other Ports provide mitigation sites.

As noted, at present the section of the Port shoreline being considered for an RV campground is not included in the downtown residential strategy. It could be appropriate to locate a mitigation site in this area as a commercial zone. The proposed RV campground is not directly adjacent to Swantown Marina. RV ("land yacht") mitigation site residents would not impinge on or displace Swantown Marina "liveaboard" boat residents, or on the "urban intensity" zoned areas. It seems reasonable to assume that the public would expect consideration of this possibility, given the immediacy and urgency of the housing crisis.

Cari Hornbein

From: Nicole Floyd
Sent: Tuesday, June 01, 2021 8:12 AM
To: Cari Hornbein
Subject: FW: RV Park

Public comment for you.

From: Bette Jean Phillips <bettejeanp@outlook.com>
Sent: Friday, May 28, 2021 11:11 AM
To: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Subject: RV Park

External Email Alert!

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Please do not add an RV Park next to Swantown Boatworks. It would ruin the entire area. Keep that area an open area. What about runoff into the sound from the RV's. Are they to be lived in??

Cari Hornbein

From: Barbara Herman <hermanbarbara@icloud.com>
Sent: Sunday, June 13, 2021 9:54 AM
To: Cari Hornbein
Subject: Recreational vehicle parks on waterfront

External Email Alert!

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Please add my vote against this proposal. This is our city's beautiful recreational area and doesn't need to be mucked up with RV parks.

Sent from my iPad
Barbara

Cari Hornbein

From: mary fitzgerald <olymfitz@hotmail.com>
Sent: Wednesday, July 07, 2021 11:50 AM
To: Cari Hornbein
Subject: RV park within Swantown development area.

External Email Alert!

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Dear Ms. Hornbein,

I would like to voice my support for the proposed change to city regulations to allow development of an RV facility at the Swantown site. A small park would be a good way to attract visitors to the downtown core that includes many restaurants, shops, the farmers market and public access to our beautiful waterfront.

Many people will oppose this idea because when they think of RVs, they only think of the homeless population that appears to litter, and disrespect the city that has been most generous in allowing them to populate areas around the lake and along the road into the St. Peter hospital.

Their RVs and obvious lack of ability to pay to live in a proper facility does not reflect the type and majority of visitors this facility would attract. In general RVers are responsible, clean and financially sound.

Most state parks keep the RVs allowed at kept under 23 feet which would help with road and turnaround space required. The Port of Port Townsend has a small RV park that is very popular and a place where boaters can meet up with RVers. Attracting both to the same area of downtown will benefit the downtown businesses that have suffered so greatly during the covid pandemic.

I fully support the city's exploration of this issue and think it would be a positive use of the empty space that surrounds the Swantown/Port of Olympia peninsula.

Thanks for your time and consideration.

Sincerely,
Mary Fitzgerald
Olympia Resident 38 years

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Cari Hornbein

From: Karen Bray <gkbray@gmail.com>
Sent: Tuesday, June 15, 2021 4:20 PM
To: Cari Hornbein
Subject: Port of Olympia's plan to build a RV park

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Dear Ms Hornbein:

We are hopeful that considerations concerning reduction of CO2 emissions and sea level rise will prevail and the Port's application will be denied. It does not seem an appropriate use considering the adoption of the Climate Mitigation Plan. We have been sailors most of our lives, but the last few years we have explored land by RV, albeit a very small one. We are familiar with RV parks and opportunities for holding tank mishaps and excessive use of generators. All of which are inconsistent with improving water and air quality.

As a nearby neighbor of the Port we already live with light and noise pollution. We have participated in the Audubon Christmas bird count and Cornell backyard bird count for almost 50 years. There has been a dramatic decrease in numbers and species in the East Bay area....and reduction in salmon return to Moxley Creek.

As city taxpayers we would like to see that parcel used for a place where Olympians can gather on the near shore....perhaps restore a marsh area for habitat for birds, amphibians and fish. Perhaps a place where children could actually put their feet in the sea water. instead of a concrete artificial stream at the East Bay Plaza.

We appreciate the opportunity to comment on this application.

Kind Regards,
Karen Bray

Cari Hornbein

From: Karen Bray <gkbray@gmail.com>
Sent: Wednesday, July 07, 2021 2:17 PM
To: Cari Hornbein
Subject: Revised code amendments for the Port

External Email Alert!

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As folks who have lived on the shores of Budd Inlet for over 50 years, we are concerned that the Port is not taking the Thurston Climate Mitigation Plan very seriously. RV owners, and we have been one, run generators, are sloppy about emptying their holding tanks and generally produce a lot of non recyclable trash. Private and State Parks seem to be doing a fine job of filling that need.

As the Ports closest neighbor on East Bay Drive we already live with light pollution, excessive noise, and air pollution from logging trucks and equipment.

We have attended city meetings in the past about sea level rise mitigation. What we learned from those meetings is that the natural shoreline is important to absorb the rise and we need to be creating more.

We taxpayers have been supporting the Port quite handily over the years. What about a park for "We Olympians" so kids can actually put their feet in the water, view shore birds, learn about the tides, and picnic.

Thank you for the opportunity to comment,

Karen and George Bray